



PUBLIC HEALTH

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Drainfield Remediation Product Rules

State Board of Health

May 10, 2006

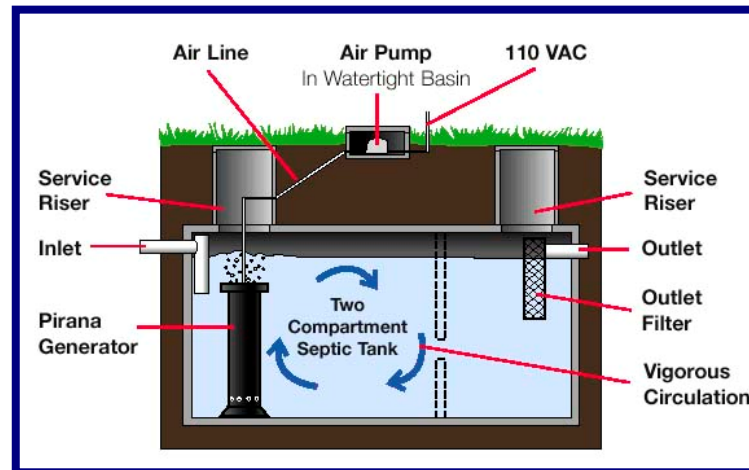
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Briefing provides:

- Status of drainfield remediation products
- What other states have done
- What Washington has done
- DOH recommendation to petition
- Issues for consideration

Petitions:

- Make rules for aerobic bacterial generator
 - ◇ From legislators and Lt. Governor
 - ◇ To recover failed drainfields
 - ◇ To denitrify in soil



Repair Actions (WAC 246-272-01001)

“Repair means **restoration**, by reconstruction or relocation, or **replacement** of a failed on-site sewage system.”

The rules are silent to remediation actions for failing systems.

Remediation – process of fixing a condition by:

- ▣ Biological Processes
- ▣ Chemical Processes
- ▣ Physical Processes

Possible advantages- less cost & site impacts than a mechanical repair.

Current Product Regulation

WACs 246-272, 272A, 273

- Treatment Technologies
 - ◆ New Systems
 - ◆ Repairs
 - ◆ Nothing for remedial actions
- Distribution technologies
- Additives

Other States – Pirana ABG

- Approval/Listing – New Hampshire, Wisconsin, Virginia
- Non-objection letter – New York
- Approved as additive – Florida, Washington

Washington's Actions

- Approved Pirana Blend as additive
- Local health officers – authority to permit remedial applications
- DOH – issued guidance documentation to assist LHOs

Petitions

- Approve IAPMO standards & make rule changes allowing technology
- Create mechanism for accepting existing ANSI standard
- Craft mechanism allowing product approval based on treatment in drainfield

DOH Recommendation

- Begin rule making when resources can be shifted
- Work with technical experts
- Address all remedial processes
- Consider issues

Issues for Consideration

- Potential causes of failure are many
 - ◆ Diagnosis of contributing causes is necessary
 - ◆ Knowing causes enables determination of which remedial strategy may be appropriate
 - ◆ Local health officer determines strategy

Issues for Consideration

- Biological remediation – primary purpose is to restore biologically clogged drainfield
- If failure is due to another cause, use of biological remediation may not work
- The damage from failures along marine shorelines is usually due to inadequately treated effluent

Issues for Consideration

- Acceptability of IAPMO standard is not known
 - ◇ Testing protocol needed for all similar products
 - ◇ Must be agreed to by national experts

Issues for Consideration

- Some site conditions – may be increased treatment concerns
- Rules may reduce current flexibility – other manufacturers may not want detailed rules
- LHOs make final determination
- WAC 246-272A has a protocol for nitrogen removal technologies

In the meantime - Pirana ABG

- LHOs may permit product
 - ◆ Approved as an additive
 - ◆ Use existing DOH guidance document
- Currently undergoing NSF testing – may allow statewide use as treatment product
- National testing protocol for nitrogen in WAC 246-272A – available to Pirana ABG

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<http://www.doh.wa.gov/wastewater.htm>